

STATE OF WISCONSIN
SUPREME COURT
Case No. 99-3297-OA

EMPLOYEE TRUST FUNDS BOARD, THE
DEPARTMENT OF EMPLOYEE TRUST FUNDS,
and ERIC O. STANCHFIELD, Secretary of the
Department of Employee Trust Funds,

Petitioners,

WISCONSIN PROFESSIONAL POLICE ASSOCIATION, INC.,
JOHN CHAREWICZ, DAVID MAHONEY, SUSAN ARMAGOST,
and STEVEN URSO,

Proposed Intervening Petitioners,

v.

GEORGE LIGHTBOURN, Acting Secretary
of the Wisconsin Department of
Administration, JACK C. VOIGHT,
Wisconsin State Treasurer,

Respondents,

WISCONSIN EDUCATION ASSOCIATION
COUNCIL, by its President TERRY CRANEY
and its Vice-President, STAN JOHNSON, and
DONALD KRAHN, MARGARET GUERTLER,
GERALD MARTIN, and PHYLLIS POPE,

Intervening Respondents.

WISCONSIN PROFESSIONAL POLICE ASSOCIATION'S
MOTION TO INTERVENE

The above-named Proposed Intervening Petitioners, by their attorneys, Cullen,

Weston, Pines & Bach, seek to intervene as petitioners in the above-entitled action pursuant to Wis. Stat. §803.09. They are proper parties to this proceeding and will be prejudiced if this case proceeds to judgment without their participation.

1. The above action is now pending in this Court. Petitioners seek a declaratory judgment that certain sections of 1999 AB495 are an unconstitutional taking without just cause, an unconstitutional impairment of contract, a violation of the state and federal constitutional guarantees of equal protection, and a violation of state statutes.

2. The Wisconsin Professional Police Association, Inc. ("the WPPA") is interested in the outcome of the action and in the subject matter thereof because it represents, as a labor union and association, past and present public employees who are protective occupation participants with pensions vested in the Wisconsin Retirement System (WRS). The interests of the members of the WPPA in the WRS will be affected and materially altered if 1999AB495 is allowed to go into effect as written. Their interests may also be affected and materially altered by a ruling from this Court.

3. The individual Proposed Intervening Petitioners, John Charewicz, David Mahoney and Susan Armagost are employed as law enforcement officers and are current protective occupation participants in the WRS. The individual Proposed Intervening Petitioner, Steven Urso, is a retired deputy sheriff who is in the protective occupation participant category with the WRS.

WHEREFORE, these movants pray that they be allowed to intervene in this

action and that the Court stay all proceedings herein until a hearing is had upon this application.

Dated this ____ day of January, 2000.

Respectfully Submitted,

CULLEN, WESTON, PINES & BACH

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